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September 23, 2021

Ms. Marlene H. Dortch

Secretary

Federal Communications Commission

445 12th Street, SW

Washington, DC 20554

RE: Ex Parte Presentation, Text-to-988 Draft FNPRM (WC Docket No. 18-336)

Dear Secretary Dortch,

On September 21, 2021, Vibrant Emotional Health (Vibrant), administrators of the National Suicide Prevention Lifeline (Lifeline), met with representatives of the Federal Communications Commission (Commission) to clarify Lifeline's texting notification process and the Further Notice of Proposed Rulemaking.

Vibrant applauds the Commission's efforts to reduce suicides and increase accessibility of the Lifeline through the designation of 988. Vibrant agrees, and respondents to the proceedings also support, with the Commission's view that *"Increasing the convenience and immediacy of access to a national suicide prevention and mental health crisis hotline via a 3-digit dialing code will therefore help spread a proven, effective intervention."*¹

In support of this shared goal, Vibrant reiterated its support for the uniform availability of 988 across modalities, including texting on July 16, 2022. As noted by Communication Equality Advocates in their petition for reconsideration, "persons in crisis who may be considering suicide are likely to first use their preferred, familiar mode of communication to reach out for help"² For many individuals, particularly youth, that preferred method is likely to be texting, either from native capabilities or other forms such as MMS, RCS, etc. The Lifeline is able to receive these forms of

**Hope
Happens
Here.**

¹ Federal Communications Commission, *Report on the National Suicide Hotline Improvement Act of 2018* published August 14, 2019.

² Communications Equality Advocates Petition for Reconsideration, In the Matter of Implementation of the National Suicide Hotline Improvement Act of 2018, WC Docket No. 18-336 (October 16, 2020)

messaging and process them according to current rich media policies. Lifeline encourages the broad definition to ensure all individuals are able to reach the Lifeline using their preferred method of communication. Commenters, including the trade association for the wireless industry, CTIA, have echoed support for text to 988 accessibility to be available at the same time as 988 voice availability.³ Vibrant discussed with the Commission how uniform availability and implementation of 988 via voice and text benefits individuals in crisis and reduces consumer confusion.

Vibrant clarified that the current process for automated text messaging occurs only when a text has been successfully delivered to the Lifeline. Once a carrier has successfully delivered a text to the Lifeline, the individual receives a standard regulatory message immediately. The individual is connected to a crisis counselor. If there is a wait to reach a crisis counselor, the individual will receive scheduled texts that let them know they're still in the queue approximately every ten minutes. The scheduled texts offer resources such as Vibrant's online Safe Space while they wait. Texters in queue are also given the option to call the Lifeline as well. Vibrant shared with the Commission that to date the Lifeline has not experienced any downtime for its text service.

Vibrant underscored that the Lifeline is unable to send automated text messages if the initial message was not successfully delivered by the carrier. In these instances, the Lifeline would have no way of knowing an individual has attempted to seek assistance. Vibrant and CTIA agree on "the importance for people in crisis to receive a notification in the event their text to the Lifeline cannot be delivered."⁴ Vibrant discussed why the Commission should utilize text to 911 bounce back rules when carriers have failed to deliver a text to the Lifeline. The text to 911 rules apply in this situation as only the carrier would be aware if a text was not delivered to the Lifeline and bounce-back messages are intended to minimize the risk of mistakenly believing that a text for assistance was transmitted when it has not.⁵

Vibrant reiterated support for bounce back messaging containing information outlining the other methods of contacting the Lifeline. Vibrant discussed how some

³ CTIA Ex Parte Notice of Ex Parte Presentation WC Docket No. 18-336 (filed September 17, 2021) at paragraph 3

⁴ Id. at paragraph 5

⁵ Federal Communications Commission Bureau of Consumer and Governmental Affairs Public Safety and Homeland Security (January 6, 2020) <https://www.fcc.gov/consumers/guides/what-you-need-know-about-text-911> Retrieved September 21, 2021



carriers, including T-mobile, already have 988-specific bounce back messages informing the individual to call the Lifeline or text the current 10 digit dialing code. Vibrant also reiterated its availability and willingness to provide clinical assistance with the content of the bounce back message so that individuals do not experience additional distress.

Vibrant appreciates the work that Commission and telecommunications providers have undertaken to make the Lifeline more accessible. Vibrant wholeheartedly agrees with the Commission's position that "...we believe that designating the 988 code for a national suicide prevention and mental health crisis hotline system is highly likely to lower suicide mortality risk in the United States....and thus that the benefits of this action are quite likely to outweigh the costs."⁶

Sincerely,

Kim Williams

Kim Williams (Sep 23, 2021 12:11 EDT)

Kimberly Williams
President and CEO
Vibrant Emotional Health



⁶ Federal Communications Commission, *Report on the National Suicide Hotline Improvement Act of 2018* published August 14, 2019.